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**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

04-AMCP-0271

APR 30 2004

Mr. A. W. Conklin, Supervisor  
Air Emissions and Defense Waste Section  
Washington State Department of Health  
P.O. Box 47827  
Olympia, Washington 98504

**RECEIVED**  
MAY 17 2004

**EDMC**

Dear Mr. Conklin:

**REQUEST FOR APPROVAL OF COMPLETED UPSTREAM SAMPLING FOR  
REDESIGNATION OF THE 296-B-1 STACK AS A MINOR EMISSION POINT**

This is a request for approval of the sampling recently performed upstream of the high-efficiency particulate air filters and prefilters at the 296-B-1 stack, for purposes of reassessing potential to emit (PTE) as indicated in Washington Administrative Code 246-247-030(21), "Determine the potential to emit by one of the following methods." Among the methods listed is (d) "Sample the effluent upstream from all control devices as approved by the department." A complete description of the sampling method is provided in the Enclosure.

The dose calculation followed the process described in HNF-3602, Revision 1, "Calculating Potential to Emit Releases and Doses for FEMPs and NOCs." Based on the upstream air sampling results, the unabated PTE was calculated. The result was calculated to be less than 0.05 millirem per year total effective dose equivalent to the maximally exposed public individual. The sampling data and calculation results are provided in the Enclosure.

This sampling is intended to provide the basis for our request to the U.S. Environmental Protection Agency (EPA) to redesignate the 296-B-1 stack as a minor emission point. Upon receiving the Washington State Department of Health's (WDOH) approval of the sampling, the U.S. Department of Energy, Richland Operations Office will follow up with requests to WDOH and the State of Washington Department of Ecology for modification to the appropriate permitting documentation.

The facility ventilated by the 296-B-1 stack is currently in a long-term surveillance and maintenance mode of operation. No out-year activities are anticipated to occur in the foreseeable future that would represent a physical or operational change at the facility resulting in an increase in the PTE.

A parallel letter is being submitted to EPA for review and approval, and we have provided you with a copy of that letter. According to Appendix A, Section IV of the FFCA, EPA agreed to respond to a stack redesignation request within 30 days. Please review and approve the upstream measurement method and results within 20 days in consideration of the EPA timeframe.

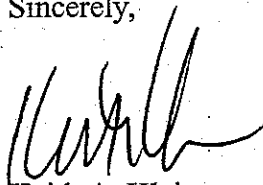
Mr. A. W. Conklin  
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Please respond regarding your review of the upstream measurement method and results. If you have questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971, or Joel Hebdon, Director, Office of Environmental Services, on (509) 376-6657.

Sincerely,



Keith A. Klein  
Manager

AMCP:PJV

Enclosure

cc w/encl:

J. A. Bates, FHI  
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L. P. Diediker, FHI  
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D. Zhen, EPA  
Administrative Record  
Environmental Portal, A3-01